

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Trunkline LNG Company, LLC	AI #:	3351	TEMPO Activity No:	PER20070001
Facility Name:	Lake Charles Receiving Terminal	Remarks Submitted by:	Charles Wait		
Permit Writer:	Kyle Prestenbach	Permit Writer Email address:	Kyle.Prestenbach@LA.GOV		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Applicable Federal Requirements 40 CFR 61 Subpart FF	40 CFR 61 Subpart FF “National Emission Standard for Benzene Waste Operations” was indicated as possibly applicable to this source category but not specifically applicable to this facility. This facility is not a chemical plant, refinery or a “hazardous waste treatment, storage and disposal” facility. 40 CFR 61 Subpart FF specifically applies to these types of sources. The only source of benzene at this facility is the 200 gallon gasoline tank. Trunkline asks that this be returned from a “3” to null or blank.	LDEQ agrees that 40 CFR 61 Subpart FF clearly does not apply to this source. This Subpart will be removed entirely from Tables X and XI.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
<p>Applicable Federal Requirements 40 CFR 63 Subpart HHH</p>	<p>40 CFR 63 Subpart HHH, "National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities" was indicated as possibly applicable to this facility. Subpart HHH specifically applies to underground natural gas storage facilities where dehydration is required to return the natural gas to pipeline quality condition. The Lake Charles Terminal does not store natural gas underground nor does it employ dehydration to return gas to pipeline quality. Trunkline asks that this be returned from a "3" to null or blank.</p>	<p>Since the Lake Charles LNG Receiving Terminal is operating under SIC 4922 (Natural Gas Transmission), LDEQ has determined that an explanation for non-applicability of this Subpart is appropriate. However, for further clarification, the non-applicability explanation was revised as follows, "DOES NOT APPLY. The LNG Receiving Terminal does not meet the definition of a <i>facility</i> as defined in 40 CFR 63.1271, and is not a major source of hazardous air pollutants (HAPs)."</p>